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1 LAWRENCE K. ROCKWELL, #72410 ANDREW S. MACKAY, #197074 2 DONAHUE GALLAGHER WOODS LLP Attorneys at Law 300 Lakeside Drive, Suite 1900 3 Oakland, California 94612-3570 4 P.O. Box 12979 Oakland, California 94604-2979 5 Telephone: (510) 451-0544 Facsimile: (510) 832-1486 6 Attorneys for Defendants 7 TYCO FIRE & SECURITY LLC and SENSORMATIC ELECTRONICS 8 9 10 11 12 SYSTEMS AMERICA, INC., a Delaware corporation, 13 Plaintiff. 14 ٧. 15 TYCO FIRE & SECURITY, a Delaware corporation; SENSORMATIC 16 ELECTRONICS CORPORATION, a 17 Delaware corporation; and DOES 1-100 inclusive. 18 Defendants. 19 20 21 22 23 24 25 26 27 28



UNITED STATES DISTRICT COURT

NORTHERN DISTRICT

CASE NO. C04 04845

STIPULATION AND PROPOSED ORDER REGARDING TRIAL DEADLINES

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Ι	Plaintiff Systems America, Inc. ("Plaintiff"), by and through its counsel Daniel L. Feder		
. 2	Esq. of the Law Offices of Daniel L. Feder and Defendants Tyco Fire & Security, LLC and		
. 3	Sensormatic Electronics Corporation (hereinafter jointly "Defendants"), by and through the		
.1	counsel Andrew S. MacKay, Esq. of Donahue Gallagher Woods LLP, hereby stipulate to the		
5	following:		
15	1. The time by which Plaintiff and Defendants must serve expert disclosures is		
7	extended from November 4, 2005 to February 24, 2006.		
3	2. The time by which Plaintiff and Defendants must disclose rebuttal experts is		
Э	extended from November 29, 2005 to March 27, 2006.		
Э	3. The time by which Plaintiff and Defendants must serve a supplemental disclosure		
.1	of expert witnesses is extended from December 2, 2005 to April 4, 2006.		
12	4. The last day to hear a motion to exclude the expert or any portion of the expert's		
13	testimony is extended from January 9, 2006 to May 1, 2006.		
14	5. The deadline for completing all discovery is extended from January 10, 2006 to		
15	May 5, 2006.		
16	6. The last day to hear dispositive motions is extended from January 23, 2006 to May		
17	29, 2006.		
l 8	7. The preliminary trial setting conference is continued from March 27, 2006 at 11:00		
19	a.m. to June 26, 2006 at 11:00 a.m.		
20	Dated: Novembor 2005 LAW OFFICES OF DANIEL L. FEDER		
21			
22	By: Comil J. Lesle		
23	Daniel L. Feder Attorneys for Plaintiff		
24	SYSTEMS AMERICA, INC.		
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1	Dated: November 24, 2005	DONAHUE GALLAGHER WOODS LLP
2		
3		By: 2d. May
4		Andrew S. MacKay Attorneys for Defendants TYCO FIRE & SECURITY, LLC and SENSORMATIC ELECTRONICS
5		SENSORMATIC ELECTRONICS
6		CORPORATION
7	IT IS SO ORDERED	
8	Dated: 11/23 , 2005	Hon Chas Wars
9		Hon. James Ware Judge of the United States District Court
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